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January 18, 2019

VIA ECF

Honorable Peggy Kuo United States District Court for the Eastern District of New York 225 Cadman Plaza East Brooklyn, New York 11201

Re: Ruane v. Bank of America, N.A., et. al., 1:17-cv-03704 (PKC) (PK)

Dear Judge Kuo:

We are the attorneys for defendant, Bank of America, N.A., in this action. Your Honor directed us to submit proposed subpoenas to the court for review and approval to be so ordered before serving them. The information in the subpoenas has been designated as confidential by Plaintiff's counsel and we would like the court's permission to submit the proposed subpoenas to the court for review and approval. The proposed subpoenas should not be e-filed because they contain confidential information. I respectfully request permission to submit the proposed subpoenas either under seal or to a confidential email address for the judge if permissible.

Respectfully submitted,

WILSON ELSER MOSKOWITZ EDELMAN & DICKER LLP

Aaron Weissberg

cc: All counsel of record (via email)